

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONALD FOXWORTH

Plaintiff,

v.

GREYSTONE ALLIANCE, LLC,

Defendant.

CIVIL ACTION

FILE NO. 1:11-cv-4299-CC-AJB

DEFENDANT GREYSTONE ALLIANCE, LLC'S
MOTION FOR SUMMARY JUDGMENT

COMES NOW, GREYSTONE ALLIANCE, LLC (“Greystone” and/or “Defendant”), Defendant in the above-referenced matter, and pursuant to Fed. R. Civ. P. 56 and L.R. 56.1, respectfully moves this Court for summary judgment against Donald Foxworth, Plaintiff, on all issues herein with the exception of Plaintiff’s claim pursuant to § 1692d(6) of the Fair Debt Collection Practices Act. In support of its Motion, Greystone relies upon the pleadings, deposition transcripts, and all other matters of record, including the Affidavit of Daniel Frisicaro.

Greystone submits simultaneously herewith its Brief in Support of this Motion for Summary Judgment and Statement of Undisputed Material Facts in support of the instant motion.

WHEREFORE, Defendant Greystone Alliance, LLC, respectfully requests that its Motion for Summary Judgment should be inquired into and granted.

This 19th day of October, 2012.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman

John H. Bedard, Jr.

Georgia Bar No. 043473

Michael K. Chapman

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CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2012, I electronically filed this **Motion for Summary Judgment** using the CM/ECF System. I additionally certify that I have this date served all parties of record with a copy of the foregoing **Motion for Summary Judgment** by depositing a copy of same in the United States Mail, with first-class postage affixed thereto, properly addressed as follows:

**Mr. Donald Foxworth
3841 Kensington Road
Unit D29
Decatur, Georgia 30032
*Plaintiff Pro Se***

This 19th day of October.

Respectfully submitted,

/s/ Michael K. Chapman
Michael K. Chapman
Georgia Bar No. 322145